

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN :
RE: : CHAPTER 13
BLANCA NERIS :
Debtors. : CASE NO.: 11-14176-sr

SELECT PORTFOLIO SERVICING as :
servicer for EQUICREDIT CORPORATION :
OF AMERICA :

Movant. :

and :
BLANCA NERIS , :
and FREDERICK L. REIGLE, CHAPTER :
13 TRUSTEE, :

Respondents

STIPULATION FOR SETTLEMENT OF
EQUICREDIT CORPORATION OF AMERICA's
MOTION FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW, comes SELECT PORTFOLIO SERVICING as servicer for EquiCredit Corporation of America ("Movant") by and through its attorneys, Zucker, Goldberg & Ackerman, LLC and files this Stipulation for Settlement of EquiCredit Corporation of America's Motion for Relief from the Automatic Stay as follows:

WHEREAS, Debtor filed Voluntary Petition for Relief under Chapter 13 of the Bankruptcy Code on May 24, 2011; and

WHEREAS, on September 1, 2011, Movant filed a Motion for Relief from the Automatic Stay ("Motion for Relief") with respect to Debtor's Real Property located at 613 Northampton Road, East Norriton, PA 19403, Montgomery County, ("Real Property"), alleging that Debtor was in default under the terms of the Note, Mortgage and Chapter 13 Plan for failure to make post-petition mortgage payments when due; and

WHEREAS, Movant and Debtor wish to resolve and settle the issues raised in Movant's Motion for Relief pursuant to the terms and conditions set forth in this Stipulation.

NOW, THEREFORE, in consideration of the above recitals and intending to be legally bound hereby, Movant and Debtor through their duly authorized counsel, hereby agree as follows:

11/30

#86

1. Debtor is to file an Amended Plan for payment in full of the Proof of Claim filed by SELECT PORTFOLIO SERVICING as servicer for EquiCredit Corporation of America, thereby converting the case into a full payoff case.

2. Should Debtor fail to make the regular Trustee payments within 20 days of the due date, Movant will send written notice of said default to Debtor and Debtor's counsel. Should Debtor fail to cure the default within ten (10) days of the date of the notice, SELECT PORTFOLIO SERVICING as servicer for EquiCredit Corporation of America will be granted relief from the automatic stay upon the filing of a Certificate of Default by counsel for Movant.

3. ~~SELECT PORTFOLIO SERVICING as servicer for EquiCredit Corporation of America shall file an Amended Proof of Claim to include additional arrears and attorney fees incurred to date.~~ *SAT*

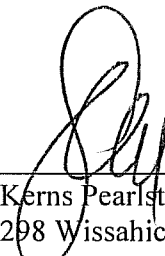
IN WITNESS WHEREOF, Movant and Debtor, by and through their respective counsels, execute this Stipulation this 19th of October, 2011.

Respectfully submitted,
ZUCKER, GOLDBERG & ACKERMAN, LLC

BY: /s/ Kimberly A. Bonner, Esquire
Scott A. Dietterick, Esquire; PA I.D. #55650
Kimberly A. Bonner, Esquire; PA I.D. #89705
Attorneys for Movant
200 Sheffield Street, Suite 101
Mountainside, NJ 07092
(908) 233-8500; (908) 233-1390 FAX

Dated: October 19, 2011

Dated:

BY: 
Kerns Pearlstine Onorato & Hladik LLP
298 Wissahickon Avenue
P.O. Box 1489
North Wales, PA 19454
215-855-9521